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NATIONAL SOLID WASTES
MANAGEMENT ASSOCIATION

February 3, 2003

Dockets Management System
U.S. Department of Transportation
400 Seventh Street, S.W.
Room PL 401
Washington, D.C. 20590

DEPT. OF TRANSPORTATION
DOCKETS
03 FEB - 3 PM 12:25

Re: Docket Number RSPA-2002-13658 (HM-215E) -30

Dear RSPA:

On behalf of the Medical Waste Institute, thank you for the opportunity to comment on your notice of proposed rulemaking, *Harmonization with the United Nations Recommendations, International Maritime Dangerous Goods Code, and the International Civil Aviation Organization's Technical Instructions*, published in the *Federal Register* on December 3, 2002.

The Institute represents transporters, shippers, treatment and disposal companies, manufacturers, distributors, and consultants in the medical waste business. We are a policy-making group within the National Solid Wastes Management Association and Waste Equipment Technology Association, who together represent service and manufacturing interests in the solid and medical waste industry.

The Institute agrees with RSPA that small quantities of hazardous materials need not require the same marking as larger quantities (49 CFR §§ 172.301, 172.312, and 172.215). In fact, making a distinction in the marking for packaging that does not exceed 50 ml of liquid infectious substances may assist emergency responders in managing an incident.

In addition, the Institute agrees with RSPA that under the general packaging requirements in section 173.24 shippers should be required to follow manufacturers' instructions. Manufacturers have the best knowledge on how to seal their packaging to prevent leakage during transport.

If you have any questions, please contact me at 800-424-2869 or alicej@envasns.org.

Sincerely,

A handwritten signature in black ink that reads "Alice P. Jacobsohn". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Alice P. Jacobsohn
Director, Medical Waste Institute